

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

---

FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN, ROBIN  
MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

Adv. Ref. Nos. 35, 39 & 42

**CERTIFICATION OF COUNSEL**

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), including the above-captioned Plaintiffs FTX Trading Ltd. and Maclaurin Investments Ltd., (the “Plaintiffs”) hereby certify as follows to the best of my knowledge, information and belief:

1. On November 8, 2023, Defendant Brandon Williams (“Williams”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion for Protective Order* [Adv. D.I. 35] (the “Motion”).

---

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

2. On November 14, 2023, Defendants Patrick Gruhn (“Gruhn”), Robin Matzke (“Matzke”), and Lorem Ipsum UG (“Lorem Ipsum,” together with Gruhn and Matzke, “LI Defendants,” and together with Williams and Plaintiffs, the “Parties”) filed *Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG’s Joinder in Motion for a Protective Order Staying Discovery* [Adv. D.I. 39]. Additionally, Plaintiffs FTX Trading Ltd. and Maclaurin Investments Ltd. filed *Plaintiffs’ Opposition to Defendant Brandon Williams’ Motion for a Protective Order Staying Discovery* [Adv. D.I. 42].

3. On November 15, 2023, the Court held a hearing (the “Hearing”) to consider, among other things, the Motion.

4. The Plaintiffs have drafted a proposed form of order (the “Proposed Order”), a copy of which is attached hereto as **Exhibit A**. The Proposed Order has been circulated to counsel for Williams and the LI Defendants who have reviewed and have no objection to entry of the Proposed Order. In accordance with the Court’s electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

5. Accordingly, the Parties respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: December 1, 2023  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew B. McGuire

Adam G. Landis (No. 3407)  
Matthew B. McGuire (No. 4366)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
mcguire@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Steven L. Holley (admitted *pro hac vice*)  
Stephen Ehrenberg (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Christopher J. Dunne (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
E-mail: holleys@sullcrom.com  
ehrenbergs@sullcrom.com  
glueckstein@sullcrom.com  
dunnec@sullcrom.com

*Counsel for the Debtors  
and Debtors-in-Possession*